

THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

THE UNITED STATES OF AMERICA,

Case No. 1:20-CR-183

Plaintiff,

Hon. Robert J. Jonker
Chief U.S. District Court Judge

v.

ADAM DEAN FOX,
BARRY GORDON CROFT, JR.,
KALEB FRANKS,
DANIEL JOSEPH HARRIS, and
BRANDON MICHAEL-RAY CASERTA,

Defendants.

DEFENDANTS' SECOND JOINT SUPPLEMENT TO MOTIONS TO COMPEL

This is the defendants' second supplement to their discovery motions. On August 27, 2021, the defendants advised the Court about the connection between a company (Exeintel) that Jason Chambers owns that is linked to the Twitter account @ravagiing. The messages posted on this account pose serious questions about the connection between the company and the facts of this case. On August 29, 2021, the defendants learned that @ravagiing has removed many of the messages that show Exeintel may have coordinated the @ravagiing tweets with FBI actions in this investigation. The defendants cannot explain who removed the tweets—that explanation will come after further discovery.

The “why,” though, is obvious: BuzzFeed discovered the situation, and the defendants notified the Court. The most accurate descriptive term for what is happening seems to be “cover up.” The act of trying to cleanse the Twitter account, after the defendants

filed their pleading about the connection between the account and Chambers, is sinister. It may well constitute spoliation of evidence. The suspected misconduct here is turning into a runaway train. The defendants request the Court consider these facts as it hears the defendants' discovery motions, and their requests to call witnesses, at the motion hearing.

Respectfully submitted,

Date: August 29, 2021

/s/ Christopher M. Gibbons
Christopher M. Gibbons
GIBBONS & BOER
Attorney for Defendant Adam Fox
2404 Eastern Ave SE
Grand Rapids MI 49507
(616) 460-1587

/s/ Joshua A. Blanchard
Joshua A. Blanchard (P72601)
BLANCHARD LAW
Attorney for Defendant Barry Gordon Croft, Jr.
309 S. Lafayette St Ste 208
PO Box 938
Greenville, MI 48838

/s/ Scott Graham
Scott Graham
SCOTT GRAHAM, PLLC
Attorney for Defendant Kaleb Franks
1911 West Centre Avenue, Suite C
Portage, MI 49024
(269) 327.0585

/s/ Julia A. Kelly
Julia A. Kelly (P77407)
WILLEY & CHAMBERLAIN LLP
Attorney for Defendant Harris
300 Ottawa Avenue, N.W., Suite 810
Grand Rapids, MI 49503
(616) 458-2212

/s/ Michael D. Hills
Michael D. Hills (P58571)
Attorney for Defendant Brandon Caserta
HILLS LAW OFFICE, P.C.
425 South Westnedge Ave
Kalamazoo, MI 49007
(269) 373-5430